

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:21CR226
)	
Plaintiff,)	JUDGE PAMELA A. BARKER
)	
v.)	
)	
DAVIS LU,)	MOTION FOR LEAVE TO FILE UNDER
)	SEAL
Defendant.)	
)	

The United States of America, by and through its counsel, Rebecca C. Lutzko, United States Attorney, and Daniel J. Riedl, Assistant United States Attorney, and Candina S. Heath, Senior Counsel, Department of Justice Computer Crime and Intellectual Property Section, requests leave of this Honorable Court to file its Motion to Exclude Defense Expert's Report and Inadmissible Testimony under seal. The defense expert's report, which will be attached to the motion, contains sensitive proprietary information about the victim's network. Public disclosure of this information could be harmful to the victim. After filing, the United States will serve the Defendant's counsel with the document.

Respectfully submitted,

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United States Attorney

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